

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

Paramount Citrus Packing §
Company, LLC, as successor in interest §
to Healds Valley Farms, Inc., §
Plaintiff, §
v. § CIVIL ACTION NO.: 7:13-CV-00613
Federal Crop Insurance Corporation §
and Risk Management Agency §
Defendants. §

**PLAINTIFF'S UNOPPOSED MOTION FOR CONTINUANCE
OF INITIAL PRE-TRIAL CONFERENCE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES, Plaintiff, **Paramount Citrus Packing Company, as successor in interest to Healds Valley Farms, Inc.**, and files this unopposed motion for continuance of the Initial Pre-trial Conference.

A. INTRODUCTION

1. Plaintiff is Paramount Citrus Packing Company, LLC.; defendants are Federal Crop Insurance Corporation (hereinafter referred to as "FCIC") and Risk Management Agency (hereinafter referred to as "RMA").
2. Plaintiff filed a complaint for judicial review.
3. The initial pre-trial conference is set for January 9, 2014.

B. REQUEST FOR CONTINUANCE

4. Defendants, FCIC and RMA are United States agencies and are not required to file an answer until 60 days after service. Fed. R. Civ.P. 12 (a)(2) Defendants' answers are due January 20, 2014, which is after the initial pre-trial conference currently set for January 9, 2014.

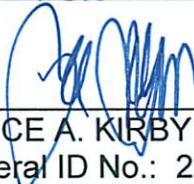
C. PRAYER

5. For these reasons, Plaintiff asks the Court to continue the Initial Pre-trial Conference until after January 20, 2014.

Respectfully submitted,

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ATTORNEYS-IN-CHARGE FOR PLAINTIFF
PARAMOUNT CITRUS PACKING COMPANY,
LLC, as successor in interest to HEALDS
VALLEY FARMS, INC.

CERTIFICATE OF CONFERENCE

I certify that on December 16, 2013, I conferred with opposing counsel, David Guerra, and he does not oppose of this motion for continuance of the initial pre-trial conference.

LANCE A. KIRBY



CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2014, I electronically filed **DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF INITIAL PRE-TRIAL CONFERENCE** with the Clerk of Court using the CM/ECF system and faxed a copy of such filing to:

David Guerra, AUSA
U.S. Attorney's Office
1701 W. Bus. Hwy. 83, Suite 600
McAllen, Texas 78501

Via Facsimile # (956) 618-8016

LANCE A. KIRBY

